

April 4, 2011

Ms. Laura E. Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated February 28, 2011 regarding our amended October 2010 Amended Monthly FEC report.

With respect to the contributions listed on the attachment to your letter:

1. The Commission's website lists New Pioneers as a non-qualified PAC. The 2010 contributions from this PAC totaled \$ 30,400, which was the permissible limit for non-qualified PACs. Therefore, there is no excessive donation from this PAC.
2. The Committee has filed an amended April 2010 monthly report to reflect that the \$ 15,000 on 3/24/10 was actually from UnitedHealth Group PAC (as reported by this PAC on its 2010 first quarter FEC filing). The United Health Services PAC donated \$ 2,000 on 6/14/10 and \$ 2,500 on 9/17/10, as reported. Therefore, there are no excessive donations from these donors.
3. The Committee issued refunds to Spirit Fund on 3/14/11 in the amount of \$15,000 and \$5,000. At the time these donations were made on 9/23/10, Spirit Fund had not yet notified the Commission of its multi-candidate status effective 9/21/10, and the Commission's website reflected Spirit Fund as a non-qualified committee.
4. Mr. Wayne Boich of Columbus, OH (\$ 30,400 on 9/21/10) and Mr. Wayne M. Boich of Miami, FL (\$ 12,600 on 6/30/10) are different individuals (they are father and son). Therefore, there are no excessive donations with respect to these donors.

The Committee reported on Schedule E disbursements to National Media Research Planning & Placement, LLC as of the date of the expenditures. Once the expenditures qualified by date of dissemination as independent expenditures, the required 48-hour Schedule E notices were then filed within the appropriate timeframe. Therefore, no amendment is necessary with respect to these disbursements.

Concerning the payment referenced in your letter to National Media of \$31,630.62: the payment was made on 9/3/10, as reported on Schedule E of the October monthly report. The advertising was aired first on 9/6/10, and the 48-hour notice was filed on 9/8/10. Therefore, the reporting is correct and timely on both the monthly report and on the 48-hour notice.

The Committee has filed an amended Form 1 to reflect that the Founders Joint Candidate Committee is a joint fundraising representative.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee
